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8 *Attorneys for Plaintiff, The Bank of New York Mellon Trust Company, National Association FKA  
The Bank of New York Trust Company, N.A. as Successor to JP Morgan Chase Bank N.A., as  
Trustee for RAMP 2005-RS8*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 THE BANK OF NEW YORK MELLON  
12 TRUST COMPANY, NATIONAL  
13 ASSOCIATION FKA THE BANK OF NEW  
14 YORK TRUST COMPANY, N.A. AS  
15 SUCCESSOR TO JP MORGAN CHASE  
16 BANK N.A., AS TRUSTEE FOR RAMP  
2005-RS8,

17 Plaintiff,  
vs.

18 FIDELITY NATIONAL TITLE GROUP,  
19 INC.; CHICAGO TITLE INSURANCE  
COMPANY; TICOR TITLE OF NEVADA,  
INC.,

21 Defendants.

Case No.: 2:20-cv-01373-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTIONS TO DISMISS [ECF Nos.  
14, 15 & 16]**

**[Second Request]**

22 Plaintiff The Bank of New York Mellon Trust Company, National Association FKA The  
23 Bank of New York Trust Company, N.A. as Successor to JP Morgan Chase Bank N.A., as  
24 Trustee for RAMP 2005-RS8 (“BONY”), and Defendants Chicago Title Insurance Company,  
25 Fidelity National Title Group, Inc., and Ticor Title of Nevada, Inc. (“Defendants”) (collectively,  
26 the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:  
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- 1        1. On July 24, 2020, BONY filed its Complaint [ECF No.1]
  - 2        2. On October 7, 2020, Defendants each filed a Motion to Dismiss [ECF Nos. 14, 15 &
  - 3                  16];
  - 4        3. BONY's deadline to respond to Defendants' Motion to Dismiss is currently
  - 5                  November 20, 2020;
  - 6        4. BONY's counsel is requesting a fourteen (14) day extension until Friday, December
  - 7                  4, 2020, to file its response to Defendants' Motions to Dismiss;
  - 8        5. This extension is requested in order to allow the parties additional time to discuss a
  - 9                  potential stipulation to stay litigation pending a decision in the *Wells Fargo Bank,*
  - 10                 *N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-17332 (District Court
  - 11                 Case No. 3:19-cv-00241-MMD-WGC);
  - 12        6. Counsel for Defendants do not oppose the requested extension;

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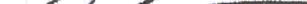
1           7. This is the second request for an extension which is made in good faith and not for  
2           purposes of delay.

## **IT IS SO STIPULATED.**

DATED this 20 <sup>th</sup> day of November, 2020.  WRIGHT, FINLAY & ZAK, LLP  <u>/s/ Lindsay D. Robbins</u> Darren T. Brenner, Esq. Nevada Bar No. 8386 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Plaintiff, The Bank of New York Mellon Trust Company, National Association FKA The Bank of New York Trust Company, N.A. as Successor to JP Morgan Chase Bank N.A., as Trustee for RAMP 2005-RS8</i>	DATED this 20thday of November, 2020.  SINCLAIR BRAUN LLP  <u>/s/ Kevin Sinclair</u> Kevin Sinclair, Esq. Nevada Bar No. 12277 16501 Venture Boulevard, Suite 400 Encino, California 91436 <i>Attorneys for Defendants, Fidelity National Title Group, Inc., Ticor Title of Nevada, Inc., and Chicago Title Insurance Company</i>
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## **IT IS SO ORDERED.**

Dated this 23rd day of November, 2020.

  
UNITED STATES DISTRICT COURT JUDGE